

EXHIBIT 1

News-Only Coordination Protocol¹

Issue	Terms
Scope of Coordination / Safety Valve Depositions	<ul style="list-style-type: none"> • Absent good cause, no individual is deposed more than once across the Consolidated News Cases, unless designated as a Rule 30(b)(6) witness or an expert who issues reports in multiple cases
Cross-Production	<ul style="list-style-type: none"> • Documents and written discovery cross-produced by Defendants across Consolidated News Cases (already ordered by the Court)
Plaintiff Side Allotted Hours	<ul style="list-style-type: none"> • 260-hour cap to be shared by the News Plaintiffs • Maximum of 175 hours per Defendant Group² • Maximum of 50 hours for non-party fact witnesses • This cap includes time for third-party depositions and Rule 30(b)(6) depositions
Defendant Side Allotted Hours	<ul style="list-style-type: none"> • 250-hour cap to be shared by Defendants across Consolidated News Cases, with a maximum of 200 hours for Plaintiffs' witnesses and 50 hours for non-party fact witnesses. • No more than 105 hours from any one Individual News Plaintiff. "Individual News Plaintiff" means The New York Times in the <i>New York Times</i> case, the Center for Investigative Reporting in the <i>CIR</i> case, and the publishers collectively in the <i>Daily News</i> case.
Per-Witness Time Limits (for depositions taken of Defendants' 30(b)(1) witnesses)	<ul style="list-style-type: none"> • Time limit of 10 hours per witness (if solely in individual capacity), to be shared by the News Plaintiffs as they see fit
Rule 30(b)(6) notices	<ul style="list-style-type: none"> • In addition to the agreed-upon custodial 30(b)(6) deposition of OpenAI, News Plaintiffs will serve one consolidated merits 30(b)(6) notice on OpenAI and one consolidated merits 30(b)(6) notice on Microsoft.³ • In addition to the agreed-upon custodial 30(b)(6) depositions of News Plaintiffs, Defendants may serve one consolidated 30(b)(6) notice for each distinct entity among Plaintiffs in the News Cases.
Rule 30(b)(6) time	<ul style="list-style-type: none"> • If any Defendant Group designates two or fewer individuals to testify regarding all topics set forth in a Rule 30(b)(6) notice, the News Plaintiffs are entitled to at least 18 hours of testimony from those individuals or individual. • News Plaintiffs may take no more than 25 hours of 30(b)(6) deposition testimony from each Defendant Group • Defendants may take no more than 25 hours of 30(b)(6) deposition testimony in each of the <i>New York Times</i> and <i>CIR</i> cases, and no more than 38 hours of 30(b)(6) deposition testimony in the <i>Daily News</i> case.
Expert Depositions	<ul style="list-style-type: none"> • This agreement does not apply to and shall not limit the number and duration of depositions of experts.

¹ The Consolidated News Cases include: *The New York Times Co. v. Microsoft Corp., et al.*, (S.D.N.Y. No. 1:23-cv-11195) *Daily News, LP, et al. v. Microsoft Corp., et al.*, (S.D.N.Y. No. 1:24-cv-3285), and *Center for Investigative Reporting v. OpenAI, Inc., et al.* (S.D.N.Y. No. 24-cv-4872). Proposal 1A is being made on behalf of the Plaintiffs in the Consolidated News Cases (the "News Plaintiffs").

² The two Defendant Groups are: (1) OpenAI, Inc., OpenAI LP, OpenAI GP, LLC, OpenAI, LLC, OpenAI OpCo LLC, OpenAI Global LLC, OAI Corporation, LLC, and OpenAI Holdings, LLC, (the "OpenAI Defendants"); and (2) Microsoft Corporation. Hours caps for Party witnesses include depositions of Party-Affiliated witnesses, including former officers, directors, and/or employees of a Party.

³ News Plaintiffs reserve the right to seek leave of Court to serve additional 30(b)(6) notices, if appropriate.

	<ul style="list-style-type: none">• The Parties shall endeavor to negotiate in good faith a separate protocol governing expert depositions.
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